

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BACKPAGE.COM LLC,

Plaintiff,

and

THE INTERNET ARCHIVE,

Plaintiff Intervenor

vs.

ROB MCKENNA, Attorney General of
Washington, et al.,

Defendants, in their official capacities.

No. C12-954-RSM

DECLARATION OF RYAN LONG

I, Ryan Long, declare as follows:

1. I am currently a sergeant in the Seattle Police Department.
2. I have an Associate's Degree from South Puget Sound Community College and have taken classes at Central Washington University.
3. I have over twenty-two years of experience working in law enforcement. I worked for the City of Olympia from 1990 to 1995, first in a volunteer capacity and then as a paid community service officer. I graduated from the reserve police officer academy and was

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1 shortly thereafter hired by the Seattle Police Department on August 4, 1995. I began my
2 career at the police officer academy and graduated at the top of my class.

3 4. I have worked in many positions within the Seattle Police Department, including but not
4 limited to: the west precinct's proactive uniform assignment; the west precinct's Anti-
5 Crime Team; the joint enforcement team of the Vice and High Risk Victims Unit; and the
6 general investigations squad of the Vice and High Risk Victims Unit.

7 5. I completed a specialized class on the subject of supervising undercover operations in
8 2006. I subsequently supervised numerous operations where undercover officers
9 contacted suspected juveniles through advertisements posted on websites such as
10 Backpage.com.

11 6. During my career, I have personally interacted with over 2500 young women I suspected
12 of being involved in prostitution-related activities and worked on over 250 cases
13 involving pimps. My contact has ranged from general welfare checks to investigations.
14 Through these contacts, I have learned important information about prostitution-related
15 crimes in Seattle and King County. For example, I learned the vernacular that is
16 commonly used by participants (pimps, prostitutes, and "johns") in this criminal
17 enterprise. I learned geographical "hot spots" for pimping and prostitution and I learned
18 the "social norms" associated with this criminal subculture. These "norms" include
19 phases of recruitment, rules of "the game," consequences for breaking the rules, and
20 tactics used by pimps to recruit and retain their victims.

21 7. I was promoted to the rank of sergeant after I completed a prerequisite promotional
22 examination. While serving as a sergeant in the east precinct, I was responsible for a
23 squad of seven patrol officers.

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- 1 8. I transferred to the Vice and High Risk Victims Unit's general investigations squad in
2 2006. My team organized large-scale prostitution stings and cooperated with the street
3 Vice squad by following up on prostitution-related crimes uncovered by the street Vice
4 squad.
- 5 9. Beginning in 2009, I served as a supervising Task Force Officer for the FBI's Innocence
6 Lost Task Force. In this position, I helped to coordinate local, regional and federal
7 operations related to the commercial sexual exploitation of children.
- 8 10. As sergeant of the Vice and High Risk Victims Unit's general investigations squad, it
9 was my responsibility to identify prostitution trends and establish new tactics and
10 strategies. In this position, I strategically refocused my squad's enforcement mission
11 from emphasis on providers to emphasis on traffickers.
- 12 11. I worked hands-on in the investigations conducted by the Vice and High Risk Victims
13 Unit's general investigations squad, including interviewing victims, suspects and
14 witnesses, preparing warrants and collecting evidence.
- 15 12. I was responsible for coordinating and supervising street level prostitution stings, as well
16 as acting as an undercover "john" during my time on the west precinct's Anti-Crime
17 Team.
- 18 13. I have significant experience working as an undercover "john" in the greater Seattle area.
19 I am very familiar with how pimps recruit prostitutes, the relationship between pimps and
20 prostitutes, the areas of metropolitan Seattle known for prostitution, and how prostitutes
21 advertise their services and solicit customers.
- 22 14. I have attended many conferences and seminars relating to prostitution and trafficking. I
23 have taught evidence-related classes at Central Washington University and Pierce

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1 College. I have taught classes at the Western Region's vice investigators association on
2 how to conduct effective stings against prostitution facilitated by internet advertisements,
3 as well as classes relating to proactive enforcement of pimps.

4 15. I have authored trainings and trained investigators from around the country on how to
5 effectively combat prostitution and related criminal activity. My trainings have focused
6 on a variety of topics including internet stings; prostitutes as victims; pimps and johns;
7 and follow-up methodologies (warrants, subpoenas, technology, etc.).

8 16. I have been involved in legislative activities relating to prostitution and have testified
9 before the Washington State Legislature and briefed Congress. I have advocated
10 legislation on behalf of the City of Seattle aimed at creating diversion programs for
11 juvenile prostitutes, one-party consent recording exception, and safe-harbors legislation.
12 I was recently invited to Israel to instruct their investigators regarding prostitution as a
13 human trafficking offense.

14 17. I have testified as a witness in approximately 100 trials for prostitution-related crimes.

15 18. I have testified as an expert witness in approximately 20 trials for prostitution-related
16 crimes.

17 19. Based on my training and experience, I know that prostitution is often facilitated through
18 advertisements in the escort sections of websites such as Backpage.com. Such
19 advertisements on Backpage.com are made by a prostitute—often at the direction of her
20 pimp—or by the pimp. In an effort to avoid detection by law enforcement, sometimes
21 the prostitute or her pimp will contract a third party to post an online advertisement. Once
22 the advertisement is posted, “dates” are set up via the phone number listed on the
23 advertisement.

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20. Based on my training and experience, I also know that the advertisements in the escort section of websites such as Backpage.com are paid for by credit card. I further know that prostitutes and pimps will frequently pay for these advertisements using credit cards that are prepaid or gift cards and cannot be traced to a particular owner.

21. I have been involved in or witnessed the arrest of over 1000 females (150 of whom were minors) for prostitution during my career. These arrests were accomplished by an undercover officer contacting a suspected prostitute in-person or through a website. Since 2007, over 90% of the "dates" leading to arrest were arranged through advertisements on websites such as Backpage.com. At least 95% of those contacted by other means admitted utilizing websites such as Backpage.com to arrange "dates" at other times.


22. I have been involved in or witnessed the arrest of over 100 pimps for promoting prostitution during my career.

23. I have been involved in or witnessed the arrest of over 25 people for the commercial sexual abuse of a minor during my career.

24. I have never contacted a person, whether juvenile or adult, using the escort section of Backpage.com who was advertising legitimate escort services.

25. I, Ryan Long, declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Executed this 6TH day of July, 2012 at SEATTLE, WA.


Ryan Long

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